

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re:

BROWN, Cynthia A.

SSN: xxx-xx-7418

Debtor

Chapter 13

Case No. 10-19354-FJB

**TRUSTEE'S OBJECTION TO CONFIRMATION OF DEBTOR'S AMENDED
CHAPTER 13 PLAN**

Now comes Carolyn Bankowski, Standing Chapter 13 Trustee ("Trustee"), and respectfully objects to confirmation of the Debtor's Amended Chapter 13 Plan, (the "Plan"), and for reasons says as follows:

1. On October 15, 2010, the Trustee convened the §341 meeting of creditors at which the Debtor was present with counsel.
2. On December 31, 2010, the Debtor filed a Chapter 13 Plan.
3. The Plan proposes monthly payments of \$1,054.06 for a term of 60 months, providing for a total Plan cost of \$63,243.60. According to the Debtor's Schedules I and J, there is \$560.63 in monthly disposable income, which is not sufficient income to fund the Plan.
WHEREFORE, the Trustee requests that the Court sustain the objection to confirmation and grant such other relief as is proper.

Dated: January 28, 2011

Respectfully submitted,

By: /s/ Carolyn Bankowski
Carolyn Bankowski, BBO#631056
Patricia A. Remer, BBO#639594
Standing Chapter 13 Trustee
Office of the Chapter 13 Trustee
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Certificate of Service

The undersigned hereby certifies that a copy of the Trustee's Objection to Confirmation of Debtor's Chapter 13 Plan was served via first class mail, postage prepaid or by electronic notice on the Debtor and Debtor's counsel at the addresses set forth below.

Cynthia Brown
26 Highland Terrace
Brockton, MA 02301

Terrance Parker, Esq.
185 Alewife Brook Parkway
Cambridge, MA 02138

Date: January 28, 2011

/s/ Carolyn Bankowski